

The Honorable Timothy W. Dore
Chapter 7
Hearing Date: December 19, 2018
Hearing Time: 1:30 PM
Hearing Location: US Courthouse /Tacoma, WA

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA

IN RE:

JOHNATHON PAGE FLATTUM,

Debtor.

Case No. 17-13890

Chapter: 7

REPLY TO TRUSTEE'S OBJECTION TO
CONFIRMATION

COMES NOW, Johnathon Page Flattum, the Chapter 7 the Debtor in the above
referenced matter, ("Debtor"), by and through his attorney, Christina L. Henry of Henry &
DeGraaff, P.S. and responds to the Trustee's objection to confirmation with strict compliance.

The Debtor appeared at the Section 341 meeting of creditors on December 13, 2018 with
proof of payment for his November 2018 plan payment, with a promise to make an additional plan
payment by December 15, 2018, with proof of increased income, and with confirmation from the IRS
representative that Mr. Flattum had filed all outstanding tax returns. The Debtor believes the
additional income will support his Chapter 13 plan and resolve any issues that the Trustee may have
with feasibility for the current plan. Prior to the hearing, Mr. Flattum will file an amended Schedule I
and J to take out the rental income listed and include the additional income he is now receiving from
his employer. He will also file an amended Schedule E to remove the priority claim for Grays Harbor
county and list is as a general unsecured claim.

RESPONSE TO TRUSTEE'S OBJECTION TO CONFIRMATION

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Additionally, the Debtor mistakenly understood that the Trustee was going to withdraw the Objection to confirmation since the issues were largely resolved at the meeting of creditors. It was only discovered on the morning of December 15, 2018 that the withdrawal was not done and thus the Debtor requests the court allow this late filed reply.

HENRY, & DEGRAAFF, P.S.

By: /s/ Christina L. Henry
Christina L. Henry, WSBA #31273
Attorney for the Debtor